

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

IN RE:

TIMOTHY RANDOLPH WILSON

Debtor.

Case No: 3:16-bk-08535

Chapter 13

Judge: CHARLES M. WALKER

**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: 12/29/2017.
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: 1/17/18 AT 8:30 AM,
COURTROOM 1, CUSTOMS HOUSE, 701 BROADWAY, NASHVILLE, TN 37203.**

**DEBTOR'S OBJECTION TO TRUSTEE'S
MOTION TO DISMISS FOR FAILURE TO FUND PLAN**

Comes now the Debtor, by and through counsel, and hereby objects to Trustee's *Motion to Dismiss for Failure to Fund Plan* [Court Dkt No. 49]. In support of this motion, Debtor would show the following:

1. Debtor's bankruptcy petition was filed on November 30, 2016.
2. Debtor has made payments to the plan via money order on October 6, 2017 in the amount of \$300.00 and on December 14, 2017 in the amount of \$500.00.
3. Debtor wishes to continue with the Chapter 13 Plan.

WHEREFORE the Debtor respectfully moves this Honorable Court to deny the Trustee's *Motion to Dismiss for Failure to Fund Plan* [Court Dkt No. 49], and for any further and just relief.

Dated on December 29, 2017.

Respectfully submitted,

/s/L.G. Burnett, Jr.

L.G. Burnett, Jr. Reg. #006463

Attorney for Debtor

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States Postal Service, postage prepaid (or, if stated below, via the U.S. Bankruptcy Court's Electronic Filing CM/ECF System), to all creditors on the attached mailing matrix and to the following:

Notice will be electronically mailed via CM/ECF to:

- HENRY EDWARD HILDEBRAND, III hhecf@ch13nsh.com
- US TRUSTEE ustpreregion08.na.ecf@usdoj.gov
- M WESLEY HALL, III on behalf of Creditor Cedar Ridge Apartments bk1@the-law-office.net, ECFBK1@yahoo.com

Timothy Randolph Wilson
603 Madison Dr.
LaVergne, TN 37086

ENCLOSURE:
DEBTOR'S OBJECTION TO MOTION TO DISMISS FOR FAILURE TO FUND PLAN

Dated on December 29, 2017

/s/L.G. Burnett, Jr.
L.G. Burnett, Jr.
Attorney for Debtor